

EXHIBIT "B"

Ashland Construction Co., et al.

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[1] Q. Was it a joint ownership or was the house
 [2] owned -- was it a joint ownership?
 [3] A. Yes.
 [4] Q. For how long did you own that home?
 [5] A. About thirty years.
 [6] Q. That takes me to 1999. Is that right?
 [7] A. Somewhere around there.
 [8] Q. Did you then sell the house?
 [9] A. No.
 [10] Q. What happened to your ownership in the
 [11] house after approximately thirty years?
 [12] A. We put it into a trust.
 [13] Q. Okay. What trust?
 [14] A. I believe they call it a grantors reserve
 [15] trust.
 [16] Q. When did you do that?
 [17] A. I would have to find that out for you.
 [18] Q. How would you go about doing that?
 [19] A. Go find the trust.

MR. HART: As we get through some of this, there could be a lot of intertwining of, like the trust and who it would go to and things along those lines. We would ask, if you don't mind,

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MR. CASEY: Dan, do we have that document?
MR. HART: No.
MR. CASEY: Can I have them?
MR. HART: If you make a request.
MR. CASEY: I am making that request now.
MR. HART: I don't know if we have them here.

BY MR. CASEY:

Q. You told me that you owned the house for approximately thirty years. Can you tell me, with any more specificity, when that conveyance was made?

A. I assume you will find that out when we get that document, and it will give a date of transfer.

Q. Can you give me, sir, your own understanding as to the date of --

A. I don't know.

Q. You can't give me any more specific date other than approximately 1999?

A. Somewheres around there, yes.

Q. But from what you're telling me, I

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can we agree to confidentiality for this transcript? At this point you just have facts, which are of no consequence.

MR. CASEY: Yes, we can talk about that maybe during a break. But I don't think there is going to be any problem with that. Can we just find out who, rather than having me ask a lot of questions about it, can you tell me who owned the house on the date of the drowning?

THE WITNESS: It was in trust.

BY MR. CASEY:

Q. Who was the trustee?

MR. HART: That you can answer.

BY MR. CASEY:

Q. Who was the trustee?

A. Barbara Longwill.

Q. Who is Barbara Longwill?

A. My wife.

Q. Do you have trust documents reflecting this conveyance from your ownership with your wife to the trust?

A. Yes.

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[1] [2] [3] [4] [5] [6] [7] [8] [9] [10] [11] [12] [13] [14] [15] [16] [17] [18] [19] [20] [21] [22] [23] [24]

understand that on the date of your granddaughter's death, you're confident that the trust owned your Coachman Road house?

A. Correct.

Q. For what reason did you make that conveyance from your individual ownership to the trust in the name of your wife?

MR. HART: I'm going to have to object because the scope of the deposition here is venue and jurisdiction, as far as his individual contacts with the Commonwealth of Pennsylvania. His motivation for forming the trust, I don't think, has anything to do with the issues here.

BY MR. CASEY:

Q. Were there any other entities, other than your wife, named as trustee?

A. No.

Q. Do you own any businesses today, sir?

A. Personally?

Q. Yes.

A. No.

Q. Do you, through any corporate or other